

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

JAMETRIUS MCCON,

Plaintiffs,

v.

ADOLFO PEREZ; D&D EXPRESS
TRANSPORT,

Defendants.

CIVIL ACTION NO.:
1:17cv77-LG-RHW

NOTICE OF DEPOSITION AND DUCES TECUM

Pursuant to Fed. R. Civ. P. 30, Plaintiff Jametrius McCon will take the deposition of Shannon Burgess, upon oral examination on **October 16, 2017 at 9:00 a.m. in Birmingham, AL, at a location to be determined and identified.**, unless otherwise agreed to by the parties. Testimony from this deposition will be recorded by audio, audiovisual, or stenographic means by a court reporter duly authorized to administer oaths. The deposition will continue day to day until completed.

“Duces Tecum”

1. All notes taken by you regarding the collision and this case.
2. All emails sent to you regarding this collision and this case, and all emails you sent.
3. All text messages sent to you regarding this collision and this case, and all text messages you sent.
4. All letters sent to you regarding this collision and this case, and all letters you sent.
5. All documents forwarded to you by the Defendants, the insurance company representing the Defendants (and all employers, contractors, and agents of these).
6. All billing and time records from your company regarding this collision and this case, from the date of your first contact, to the date of your deposition (this includes your time spent preparing for your deposition).
7. The names, addresses, and telephone numbers of all lawyers, law firms, trucking companies, and insurance companies who have hired you in the past 5 years.
 - Include a brief summary of the work you performed.
8. All opinion letters you have written to lawyers, law firms, trucking companies and law firms for the past 5 years.
9. A copy of any articles you have written for any publication or seminar.
10. A copy of the presentation you gave at any seminar.
11. A list of the seminars which you have spoken at in the past 5 years, including the name of the seminar, the exact conference center where it was conducted, the date, and the topic you spoke on. Produce all notes and other documents you drafted or used at this seminar.
12. A copy of all college degrees, post-graduate degrees, and all certifications in your industry.
13. A list of all cases where you have provided an expert report in the past 5 years, including the case style, court where filed, and date of your report.
14. A list of all cases where you have provided deposition testimony in the past 5 years, including the case style, court where filed, and date of your report.
15. A list of all cases where you have testified in court in the past 5 years, including case style, court where filed, and date of your report.

16. A list of all cases where your opinion has been excluded or limited in the past 5 years, including case style, court where filed, and date of your report.
17. A list of any published court opinion where your name was mentioned.
18. A list of your employers and places you have worked for the past 10 years, including the name, address, telephone number, and a description of your job duties.
19. A list of all previous claims and cases for the past 10 years where you were hired by the Defense attorney in this case, her law firm, or the insurer providing coverage to the Defendants in this case.
20. A copy of your full bill for all previous cases you worked in the past 10 years for the Defense attorney in this case, her law firm, or the insurer providing coverage to the Defendants in this case.
21. A copy of your full bill for cases that went to trial and where you testified for the past 10 years.
22. Your current CV.
23. A copy of owner's manuals of any specialized equipment you used to assist your work in this case.
24. A copy of your cellphone records from the months of April, May, and June 2016.
24. A copy of any document or treatise you used to assist you in formulating your opinions in this case.

Respectfully submitted,

By: /s/ Edward P. Rowan
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CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of September, 2017, the foregoing document has been filed with the Clerk of Court using the Court's ECF system and thereby served on all counsel of record having entered an appearance in this action to date.

/s/ Edward P. Rowan
OF COUNSEL